

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

INSPECTION LEASING INC., ET
AL.,

Plaintiffs,

vs.

TAVAS LLC, ET AL.,

Defendants.

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Civil Action No. 1:24-cv-00319-DII

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Plaintiffs Inspection Leasing, Inc., MBF Inspection Services, Inc., and QSSub MBF Inspection Services, Inc. and Defendants Tavas LLC, Warren Scaman, CPA, and Mark Hamill, CPA (all parties to the litigation) file this Joint Motion for Entry of Protective Order as follows:

1. This lawsuit concerns the propriety of the preparation and filing of individual and business tax returns and attendant penalties, interest, and fees. Given the nature of the suit, the parties anticipate disclosing and producing significant amounts of sensitive financial information in discovery. As such, the parties request entry of the Agreed Protective Order, attached hereto as Exhibit A.
2. All parties to the lawsuit consent and agree to entry of Exhibit A.
3. Accordingly, the parties respectfully request that the Court grant this Joint Motion for Entry of Protective Order and enter an order of protection.

Respectfully submitted

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CERTIFICATE OF SERVICE

I certfiy that I filed the foregoing document in accordance with the protocols for e-filing through the CM/ECF system in the United States District Court for the Western District of Texas on November 7, 2024, and therefore has been served upon all counsel of record in accordance with such e-filing protocols.

/s/ *Jamie L. Houston*

Jamie L. Houston